

BEFORE THE INVESTIGATIVE PANEL OF THE
FLORIDA JUDICIAL QUALIFICATIONS COMMISSION

INQUIRY CONCERNING A
JUDGE, NO. 00-211,
HOWARD C. BERMAN

CASE NO.: SC00-2491

RESPONSE TO REQUEST FOR REVIEW

Comes now the Judicial Qualifications Commission of the State of Florida, by and through its undersigned Special Counsel, and in response to the Request for Review filed in this matter by witness, Roxanne Ramos, states as follows:

1. Roxanne Ramos is a crucial witness in these proceedings. While technically not a “complainant,” since none of the victims in this case initiated the proceedings, she is nonetheless a victim of the sexual harassment of a sitting judge. That judge has listed several prosecuting attorneys including the elected State Attorney as potential witnesses on a draft supplied to the undersigned. Ms. Ramos’ fear of prosecution cannot be dismissed as “fanciful.”

2. A full review by the Hearing Panel should be accorded the witness who has fully briefed her position in her Memorandum of Law in Opposition to the Motion to Compel Testimony of Roxanne Ramos and in Support of Entry of a Protective Order.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been delivered by U.S. Mail to: The Honorable James Jorgenson, Chair, Hearing Panel, Florida Judicial Qualifications Commission, Mount Vernon Square, 1110 Thomasville Road, Tallahassee, Florida 32303; Thomas C. MacDonald, Jr., Esquire, Cook, Bell & MacDonald Mediation Group, 100 N. Tampa Street, Suite 2100, Tampa, Florida 33602; Brooke Kennerly, Executive Director, Florida Judicial Qualifications Commission, Mount Vernon Square, 1110 Thomasville Road, Tallahassee, Florida 32303; John R.

Beraneck, Esquire, Ausley & McMullen, 227 S. Calhoun Street, Tallahassee, Florida 32301; Sydney A. Stubbs, Esquire, Jones, Foster, Johnston & Stubbs, P.A., 505 S. Flagler Drive, Suite 1100, West Palm Beach, FL 33402-3475; Bettye J. King, Esquire, 625 North Flagler Drive, Suite 501, West Palm Beach, Florida 33481; and to Scott N. Richardson, Esquire, Atterbury, Goldberger and Richardson, 250 Australian Avenue South, Suite 1400, West Palm Beach, Florida 33401-5015, this _____ day of August, 2001.

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